



Giant Eagle, Inc.

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April 9, 2003

The Honorable Ann Veneman
Secretary, U.S. Department of Agriculture
Country of Origin Labeling Program
Agricultural Marketing Service
Stop 0249 Room 2092-S
1400 Independence Avenue, SW
Washington, DC 20250-0249

Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program

Dear Secretary Veneman:

I am the Vice President of Meat and Seafood at Giant Eagle Markets a retail food chain. As such, I am very concerned about the country of origin labeling guidelines that you issued.

Our meat department offers an array of beef, pork, veal and lamb cuts as well as ground beef, pork, and lamb products to consumers on a daily basis. The task of identifying the country in which the underlying animal or animals for each of those products was born, raised and slaughtered is enormous. We must be able to depend on our suppliers for that information and you must hold them accountable through strict enforcement mechanisms. We cannot look at a package of hamburger and determine whether the cow was born and raised in Canada or born in the U.S. and raised in Canada or born, raised and slaughtered in the U.S. Moreover, the operational challenges of labeling each of those items for retail sale on a daily basis are substantial.

As you develop the regulations, please consider the following:

- Hold suppliers who are responsible for cattle, hogs and lamb at birth, feeding and slaughter accountable for providing accurate information on the countries in which each stage of production occurs;
- Provide for flexible means of informing consumers of the country of origin of meat products at retail; and
- Implement reasonable record keeping requirements.

Please issue regulations that will be simple to follow and to implement.

Sincerely,

Edward Steinmetz
Vice President Meat and Seafood
Giant Eagle Markets